

From: [vsvconsult](#)
To: [Makitalo, Rebecca I.](#); [Keech, Ryan Q.](#); [Chiu, Stacey G.](#)
Subject: Subpoena Objection re: Vasana Varadarajan. In re Arjun Vasana v. Checkmate.com, Inc. - Case No.: 2:25-cv-00765-MEMF-JPR
Date: Thursday, August 28, 2025 9:02:50 AM
Attachments: [VasanaSummonsReply.pdf](#)

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Dear Counsel at kigates,

Please see attached objections to your subpoena dated August 14, compliance date September 22, case number (Case No.: 2:25-cv-00765-MEMF-JPR). There are three documents in one pdf: cover letter, objections and certificate of service.

Sincerely,
Vasana Varadarajan

Vasan Varadarajan

12615 193rd Street

Cerritos, CA 90703

vsvconsult@gmail.com

August 28, 2025

VIA EMAIL AND U.S. MAIL

Rebecca I. Makitalo, Ryan Q. Keech, Stacey Chiu

K&L Gates LLP

10100 Santa Monica Blvd., 8th Floor

Los Angeles, CA 90067

rebecca.makitalo@klgates.com, ryan.keeche@klgates.com, stacey.chiu@klgates.com

Re: Subpoena to Testify/Produce Documents to Vasan Varadarajan (served August 28, 2025— Compliance Date: September 22, 2025)

Dear Ms. Makitalo, Mr. Keech, Ms. Chiu:

Enclosed please find Non-Party Vasan Varadarajan's Written Objections to Subpoena, served pursuant to Fed. R. Civ. P. 45(d)(2)(B). Service is effected today by U.S. Mail and as a courtesy by email. Under Rule 45(d)(2)(B), the written objections suspend any obligation to produce documents unless and until the Court orders otherwise.

With respect to any testimony command, please confirm in writing that the noticed appearance is vacated pending court guidance or stipulation between the parties. Alternatively, under mutual stipulation, any deposition of myself shall:

1. proceed remotely under Rule 30(b)(4);
2. be limited to no more than 90–120 minutes on the record (Rule 30(d)(1)); and
3. be rescheduled to a mutually agreeable date following a stipulation or court order.

If you intend to insist on an in-person appearance, I will move to quash or modify the deposition subpoena accordingly.

Please also confirm written consent to service by email under Rule 5(b)(2)(E) for all papers related to this subpoena.

Absent written consent, service by U.S. Mail will remain the operative method.

Sincerely,

/s/ *Vasan Varadarajan*

Vasan V. S.

Vasan Varadarajan

Non-Party Subpoena Recipient

Enclosures: Written Objections to Subpoena; Certificate of Service

cc (via email):

rebecca.makitalo@klgates.com, ryan.keece@klgates.com, stacey.chiu@klgates.com

Counsel:

I am in receipt of your subpoena since August 14, 2025. These are my written objections under Rule 45(d)(2)(B). I will not produce documents or appear unless ordered by the Court or mutual stipulation between the parties. Written objections suspend any duty to produce unless and until the Court orders otherwise.

1. **Scope & privacy.** The requests reach years of material, including nearly all communications with my son and others, and would sweep in private family, medical, and financial information that has nothing to do with this case.
2. **No limits / not proportional.** The subpoena is not limited by subject, custodian, date range, or search terms, and is not proportional to the needs of the case (Rule 26(b)(1)).
3. **Privilege & protections.** The demands reach privileged and protected matters (personal/medical privacy, attorney–client, family communications). I do not waive any privilege or protection. If any production is later ordered, I will seek an appropriate protective order.
4. **Burden & expense.** Searching years of devices/accounts and reviewing private materials would be intrusive, time-consuming, and costly. If the Court later requires production, I will request reasonable limits, a sensible search protocol, and cost allocation for attorney review.
5. **Notice defect.** Before a non-party document subpoena, Rule 45(a)(4) requires notice to each party. My son (a party) did not receive notice or a copy before your service attempt; I told him myself. I object on that basis.
6. **No corporate custody.** I had no role with VoiceBite and maintain no corporate records. To the extent the subpoena seeks corporate materials, I object for lack of possession, custody, or control.
7. **Non-party burden.** I am a retired non-party. Rule 45(d)(1) requires parties to avoid imposing undue burden on non-parties; the Court must enforce that duty.
8. **Testimony command.** I will not appear for any deposition absent a court order. If the Court orders an examination, I will ask that it be remote (Rule 30(b)(4)), time-limited (no more than 2 hours on the record) and reasonably noticed.

These objections are made without waiver of any others that may apply. I will preserve potentially responsive materials pending the Court's direction. Please direct any further steps through the Court.

Respectfully,

/s/ Vasan Varadarajan

Vasan V.S.

Vasan Varadarajan

12615 193rd Street

Cerritos, CA 90703

vsvconsult@gmail.com | 562-448-2878

Served on August 28, 2025

CERTIFICATE OF SERVICE**United States District Court, Central District of California****Arjun Vasana v. Checkmate.com, Inc.**

Case No.: 2:25-cv-00765-MEMF-JPR

I, Vasana Varadarajan, declare:

On August 28, 2025, I served Non-Party Vasana Varadarajan's Written Objections to Subpoena on the attorney designated in the subpoena as follows:

By U.S. Mail (Fed. R. Civ. P. 5(b)(2)(C))

Rebecca I. Makitalo, Ryan Q. Keech, Stacey Chiu, K&L Gates LLP
10100 Santa Monica Blvd., 8th Floor
Los Angeles, CA 90067

I placed a true copy in a sealed envelope with postage fully prepaid, addressed as above, and deposited it for mailing at Cerritos, California via USPS.

By Email (Fed. R. Civ. P. 5(b)(2)(E)) (courtesy copy; primary service by U.S. Mail)

rebecca.makitalo@klgates.com, stacey.chiu@klgates.com and ryan.keeceh@klgates.com

Time sent: 10:00 a.m. Pacific from vsvconsult@gmail.com

Attachments: PDF of Written Objections and this Certificate of Service.

I am over 18 years of age and not a party to the above-captioned action. I personally caused the foregoing to be served as stated.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 28, 2025,
at Cerritos, California

/s/ Vasana Varadarajan



Vasana Varadarajan

12615 193rd Street, Cerritos, CA 90703

vsvconsult@gmail.com